

3/5/2008

Dear FCC Commissioners,

The letter is in response to MB Docket No. 04-233.

My name is Victor Hodgkins, I'm the Station Manager of a 5 station group of small local radio stations owned by Richard Gleason. These stations are all located in central and western Maine with call letters WOXO, WTBM, WKTQ, WTME, WEZR.

In your quest to ensure a greater degree of localism, I'd like to inform the commission that as far as our stations are concerned we work hard everyday at being the community leader for the areas we serve.

We achieve this result in many ways. On WOXO, WTBM we air a local swap shop show everyday starting at 8:30am which allows our listeners to actively call into the station and air their items for sale, or to wish someone a happy birthday. On WKTQ, WTME we air a local pastor's morning service live every Sunday. On WEZR we air a weekly local ethnic French Show in which the entire show is spoken in the local French dialect.

My List continues... On WOXO, WTBM we air live local high school sporting events, we also air programming such as NASCAR racing, and Red Sox baseball, and we even air a request hour each weekday.

On WKTQ, WTME we air a wide range of spiritual programming serving the members of our community, and we air regional sports programming including the Portland Pirates, and Portland Seadogs.

On WEZR we specialize in newscasts that feature many local community leaders.

On all of our stations we air programming formats that excite the marketplace, we offer prize contests, we air storm cancellations, local news, local weather, local PSA's and even a large number of advertisers voice their own commercials.

Our 5 Station group epitomize what "being local" is all about... and the commission should be proud of our efforts.

It is my opinion that these proposed rule changes would have a dramatic negative effect on not only our stations but to most stations across the nation. In addition, I believe that these proposals while well intentioned, would actually create an environment that offers “less localism” with fewer and fewer choices for listeners.

You might ask why do I state this... the answer is both simple and complex. Simple, because stations like ours survive through the creation of local ad revenue and on-going cost containment for expenses. These are small enterprises, with tight cash flows. Your proposal for a main studio for each city of license, and 24/7 staffing would be so cost prohibitive, that it would actually cause owners like Dick Gleason to shut down operations, costing jobs, including mine.

You could respond that station owners who did not want to carry the new imposed burdens could simply put their station up for sale. My response to that would be... who in their right mind would want to buy a station or group of stations that offer nothing but more regulations, softer or even negative cash flows, and tougher re-sale values.

You could respond, well then owners should raise revenue by increasing rates... And my response would be that that would have the exact opposite effect that the idea provides. Fewer businesses, would advertise... meaning that the effect would be “less localism”... our community would be less informed to what local businesses offer for products and services. And after all, it sounds like one of your goals is for a more informed marketplace.

Complex, because the FCC should encourage the free exchange of ideas with the least amount of regulation as possible... the FCC should encourage a system that understands that when a listener listens to a program, or a station... the listener is “voting” for what they want to hear... not what some well intentioned folks in Washington DC believe they should want to listen to. Every listener who has tuned in a radio station today has voted... the question is “ Will the FCC listen to the voice of the voter?” By imposing these rule changes the FCC will be forcing undue and unnecessary hardships on local stations like ours. The FCC will be taking a chance that many stations like ours could “go dark” across the country. The FCC will be taking the power away from the marketplace of free ideas, and free choice... and instead, be saying “we know better than you what you the listener want to listen to” and “we know better than owners how the marketplace wants it’s localism served”.

With respect, I say not. I say, that less localism will occur with these rule changes, not more. I say, let our stations and all of the stations like ours continue to serve the local marketplace, because it is we who are closer to the communities we serve, it is we who in order to survive, must continue to understand what our community wants and needs.

Thank you for your consideration.

Respectfully,

Vic Hodgkins
Station Manager
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